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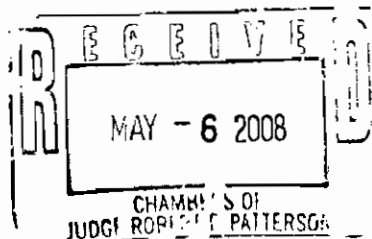
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May 6, 2008



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BY FAX

Honorable Robert P. Patterson
 United States District Judge
 Daniel Patrick Moynihan United States Courthouse
 500 Pearl Street, Room 2250
 New York, New York 10007

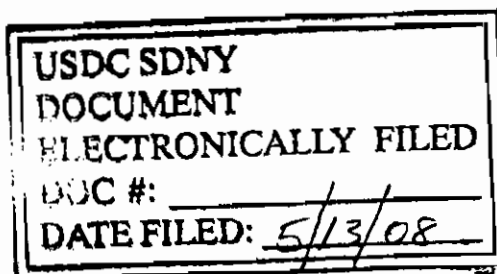
Re: Coach Services, Inc. v. Vani U.S.A. Inc.
 Civil Action No. 07-Civ-08354 (RPP)
 Our Docket No. 7162/77769

Dear Judge Patterson:

Plaintiff, COACH SERVICES, INC. ("Coach"), hereby requests a pre-motion conference to discuss possible sanctions against defendants GUANGZHOU WEINI LEATHER CO. LTD. ("Weini") and GUANGZHOU HUANI CO. LTD. ("Huani"), pursuant to Rule 37(b) F.R.Civ.P.

Your Honor will recall that defendants Weini and Huani did not respond to plaintiff's first request for production of documents and things. Upon Coach's application, your Honor issued an order on April 17, 2008 (Docket No. 16), requiring defendants Weini and Huani to respond to plaintiff's first request for production of documents and things by April 30, 2008. No response has been received.

Accordingly, on May 2, 2008, Coach's undersigned counsel telephoned and wrote to defendants' counsel to determine whether responses and documents were forthcoming. Defendants' counsel, Ms. Hadfield, told me that there would be no further responses. I gave her until May 5, 2008, to produce any further documents. Again, no responses or documents have been received.



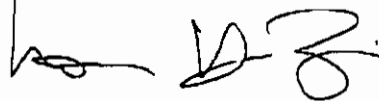
MEMO ENDORSED

Honorable Robert P. Patterson
May 6, 2008
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It should also be noted that on March 31, 2008, defendants Weini and Huani served their first request for production of documents and things on Coach, to which Coach has responded. Discovery obviously is a two-way street.

Therefore, it is respectfully requested that the Court hold a conference or otherwise issue an order granting sanctions against defendants Weini and Huani, including payment of expenses under Rule 37(b)(2)(C), and for such other and further relief as the Court deems just and proper.

Respectfully,



Norman H. Zivin (NZ-6053)
Attorney for Plaintiff

NHZ/ef

cc: Frances P. Hadfield, Esq. (by fax)

SEE TYPEWRITTEN MEMO
ENDORSEMENT ATTACHED

Application granted.
A conference will be
held on this application
on May 16th at 4:30 AM.
Defendants Weini and Huani
and counsel are to attend.
So ordered
R. P. Patterson
May 13, 2008

Case: Coach Services v. Vani USA, Inc., et al.
Index No. 07 Civ. 8354 (RPP)

MEMO ENDORSEMENT READS:

Application granted.

*A conference will be held on this application on May 16, 2008
at 9:30 a.m. Defendants Weini and Huani and counsel are to attend.*

So ordered.

Robert P. Patterson, Jr., U.S.D.J., May 13, 2008